

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Review of the Commission's Rules Governing the 896-901/935-940 MHz Band)	WT Docket No. 17-200
)	
Realignment of the 896-901/935-940 MHz Band to Create a Private Enterprise Broadband Allocation)	RM-11738 (Terminated)
)	
Amendment of the Commission's Rules to Allow for Specialized Mobile Radio Services Over 900 MHz Business/Industrial Land Transportation Frequencies)	RM-11755 (Terminated)
)	

COMMENTS OF THE GRIDWISE ALLIANCE

The GridWise Alliance (GridWise) appreciates the opportunity to comment on this Notice of Inquiry (NOI). GridWise consists of electric utilities (including investor-owned utilities, rural electric cooperatives and municipal utilities), information and communications technology equipment and service providers, National Laboratories, academic institutions, and Regional Transmission Operators (RTOs) and Independent System Operators (ISOs), and has been working since 2003 to advance the modernization of the electric system.¹

GridWise has long recognized the potential need for more *dedicated* spectrum for electric and natural gas utilities, and that this could consist of access to broadband spectrum for some utilities. However, GridWise also recognizes that some utilities currently are using the 900 MHz band for narrowband operations and would not want to inadvertently harm these utilities. In addition, maintaining the safety, reliability, and security of grid operations and the entire electric system is paramount.

Moreover, GridWise underscores the growing needs and interactions between the electric, information technology (IT), and telecommunications sectors with new technologies and capabilities that enable two-way, if not multi-directional, flows of power, information, and communications, greater consumer choice, and greater opportunities to prevent power outages and restore power more quickly when outages do occur, in most instances.

GridWise thus cautions the FCC against changes that might have unintended consequences, such as potential negative impacts to critical communications and/or grid safety, security, and reliability.

¹ The views expressed here do not represent those of GridWise's National Laboratory or RTO/ISO members, nor the Bonneville Power Administration (BPA), as these entities do not participate in advocacy/lobbying activities.

GridWise recognizes the complexity of this issue, stands ready to be a resource to the Commission, and welcomes the opportunity to meet with relevant Commissioners and Staff to discuss this issue further.

Should you have any questions regarding this Submission, please contact me at: shauser@gridwise.org or (720) 254-8020 or GridWise's Policy Director, Ladeene Freimuth, at: lfreimuth@gridwise.org or (202) 550-2306.

Sincerely,

A handwritten signature in dark ink, appearing to read "S. Hauser". The signature is written in a cursive, slightly slanted style.

Steven G. Hauser
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